

Response to the Applicant's Written Representation [REP2-082]

This submission responds to the Applicant's Response to my Written Representation [REP1-127] and builds on points previously raised.

Applicants Internal Ref WR40

Having raised several points about the inconsistent and conflicting information on the placement of Power Conversion Systems (PCS) units (also referred to as inverters), referenced within the applicant's documentation, I thank the applicant for their response to my points and note the applicant will be updating documentation accordingly.

However, whilst reading through the Applicants responses to other WRs, the applicant has re-introduced contradictory statements. For example, the applicant's response to [REP1-125] (Applicants Internal Ref WR80) where the noise and location of the PCS units was raised, the applicant stated

"The location of PCS units will be determined during the detailed design stage and in most cases PCS units will be at least 200m from residential properties. Where this is not feasible, noise levels from the PCS will not exceed the limits outlined in the ES chapter, and additional noise mitigation will be provided to ensure this is the case".

This statement by the applicant differs from the response the applicant gave to my WR [REP1-127] where the applicant referenced the post hearing note from the Open Floor Hearing 1 (Item 2.4, page 4-5 [REP1-076]) where it was stated

"Where practicable, PCS units (which include inverters) will not be located within 100m of residential properties and will not be located within 50m of PRow"

The applicant repeatedly qualifies its commitments with phrases such as "where practicable" or "if feasible". Such wording is open to interpretation and, in practice, could allow a PCS unit to be sited immediately adjacent to a residential property, provided unspecified "acoustic mitigation" is later promised. This undermines confidence in the assessment and raises questions about enforceability during the detailed design stage.

The Applicant has stated they cannot provide details of what acoustic mitigation would be required at this stage, since this depends on the final design of the scheme. This

means residents cannot currently understand what acoustic mitigation may involve. Therefore, how can the impacts be fully assessed within the Environmental Impact Assessment (EIA). The applicant has stated additional noise mitigation will be required for 2 residential properties in relation to noise from the BESS and substations. Since this need is known at this stage, surely the Applicant should be able to provide illustrative examples of the type of mitigation that would be employed, with a similar approach required for PCS units.

I still therefore have some unresolved questions in relation to the placement of the PCS units and associated noise, and I respectfully ask the Applicant and the Examining Authority to address the following:

1. Will the design principle be that PCS units are not within 100 m of residential properties “where practicable,” or that PCS units will be at least 200 m from residential properties “in most cases”?
2. Why can more defined wording not be used in relation to the placement of the PCS units?
3. Will the applicant be sending updated information out to communities/residents who received incorrect information during the statutory consultation about the distances of PCS units in relation to residential properties?
4. How can the Environmental impact be accurately assessed for impacts around visual, noise and flooding in relation to the PCS units, when the applicant is not able to state where these are being situated within the scheme.
5. If noise cannot be adequately mitigated to comply with Requirement 16 of the draft DCO, what safeguards exist to prevent residents from being left to live with unacceptable noise levels for an extended period?
6. Why can examples of acoustic mitigation measures not be provided to demonstrate how the Applicant intends to meet its obligations and to reassure affected residents? Would this mitigation have a visual or any other impacts on residents?